

## EXHIBIT 3

**From:** Jeff Maguire  
**To:** Kennedy, William  
**Cc:** [jreitzas.bnrlp.com](mailto:jreitzas.bnrlp.com); [trosenberg.bnrlp.com](mailto:trosenberg.bnrlp.com); [Petrillo, Gabriella](mailto:Petrillo, Gabriella); [Justin Marino](mailto:Justin Marino)  
**Subject:** RE: Cajilema v. Barrett - NY DOL audit and potential settlement  
**Date:** Friday, December 27, 2024 9:17:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)

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Bill,

I was not aware of any NY DOL investigation, because your clients' responses failed to disclose this information. See below. If you are not representing your clients in this investigation, who is? We will need to write to the judge to apprise the court of your clients' conduct. In the interim, please immediately provide me with the name and number of the DOL investigator.

**REQUEST NO. 35:** Produce documents consisting, containing or evidencing investigations, rulings, decisions or opinions rendered by any federal or state court or administrative agency, relating to the issue of whether Plaintiff was paid in compliance with federal and state laws. This request includes, but is not limited to, opinion letters (including opinions and advice from legal counsel) sought by Defendants concerning the compensation to Plaintiff for the Relevant Period.

**OBJECTION:** Objection. Defendants object to the extent this request seeks information protected from disclosure by the attorney-client or other privilege, the work product doctrine and/or the protection afforded mental impressions, conclusions, opinions or legal theories of one or more attorneys and/or representatives of Defendants.

**RESPONSE:** Subject to and without waiving the foregoing general and specific objections, Defendants are not aware of any responsive documents. Defendants reserve the right to amend, modify, clarify and/or supplement its responses and objections as appropriate.

Best Regards,

Jeff Maguire

Tel: (212) 939-7229

[jmaguire@stevensonmarino.com](mailto:jmaguire@stevensonmarino.com)



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**From:** Kennedy, William <WKennedy@mmwr.com>  
**Sent:** Friday, December 27, 2024 2:44 PM  
**To:** Jeff Maguire <jmaguire@stevensonmarino.com>  
**Cc:** [jreitzas.bnrlp.com](mailto:jreitzas.bnrlp.com) <[jreitzas.bnrlp.com](mailto:jreitzas.bnrlp.com)>; [trosenberg.bnrlp.com](mailto:trosenberg.bnrlp.com) <[trosenberg.bnrlp.com](mailto:trosenberg.bnrlp.com)>; Petrillo, Gabriella <[GPetrillo@mmwr.com](mailto:GPetrillo@mmwr.com)>; Kennedy, William <WKennedy@mmwr.com>  
**Subject:** Cajilema v. Barrett - NY DOL audit and potential settlement

External Email:

Jeff,

I believe you are aware of the NY DOL's audit of Barrett Roofs. I recently learned of it and that it is being

resolved. The resolution may include a payment to your client, Mr. Cajilema.

I have not been involved in the audit or resolution of it. I understand that the audit focused on public sector jobs in NY state in 2018 and 2019 and that Barrett is currently waiting for a stipulation from the NYDOL to resolve the matter. I will let you know as I receive more information, but let us know if you have time for a call on Monday or Tuesday to discuss this matter.

Thanks,  
Bill

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